

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-cr-108 (PAM/TNL) (3)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	MOTION TO STRIKE SURPLUSAGE
Vs.)	
)	
J ALEXANDER KUENG,)	
)	
Defendant)	
)	
)	

The above named defendant by and through his attorney, Thomas C. Plunkett, Esq., moves the Court for an order striking paragraph 3 from the indictment. The paragraph reads, “Defendant J. Alexander Kueng was employed as a Minneapolis Police Department officer. He began working as an MPD officer in December 2019.” When in truth, Kueng and Lane were in midst of his 3rd shift following the completion of his training when the events leading to this indictment occurred.

In support of this motion the Defendant relies on the accompanying memorandum of law, the Indictment, the records and files in the above captioned matter, and any and all matters which may be presented prior to, or at the time of the hearing said motion.

Respectfully submitted,

Dated: August 2, 2021

/s/ Thomas C. Plunkett

Thomas C. Plunkett

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